

**RICHARD PALMA**  
**ATTORNEY AT LAW**  
**225 BROADWAY- SUITE 715**  
**NEW YORK, NEW YORK 10007**

**MEMBER OF THE BAR**  
**NEW YORK**

**TEL. (212) 686-8111**  
**E-MAIL - [rpalma177@gmail.com](mailto:rpalma177@gmail.com)**

March 31, 2025

**ECF**

Hon. LaShann DeArcy Hall, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Room 4H  
Brooklyn, New York 11201

**Re: U.S. v. Amaya-Ramirez, 20 Cr. 228 (LDH)**  
**The government opposes this second defense request to continue sentencing hearing for the week of October 13, 2025.**

Dear Judge DeArcy Hall:

I write respectfully seeking a continuation of the May 7, 2025 sentencing hearing of Juan Amaya-Ramirez so that a mitigation expert can prepare a report for Your Honor and the government. I respectfully ask that the hearing be continued until the first week of October 13, 2025 for the completion of a report. After reviewing the PSR, Probation's reliance on Amaya-Ramirez's account of traumatizing events, and only speaking once with his sister regarding the same, does not thoroughly document the psychosocial impact of these matters on his childhood development for the Court to exercise sentencing discretion under 18 USC §3553(a). Considering that he and his sister were too young to know all the details of these horrific events perpetrated by their father against his wife and daughters, it became self-evident to me after meeting with his mother that she is in a better position to inform the Court of these significant details.

The Government is opposed to this request stating that the victim's family wants closure. While I am sympathetic to the family's position, considering, however, that the government was not opposed to continuing codefendant Oscar Mejia Flores' sentencing hearing to July 16, 2025, Order ECF 02/28/2025, and considering furthermore that the Court has broad latitude in this case having found that the plea agreement's 30-year to life sentencing range is reasonable, Order ECF 02/28/2025, and anticipating that the government will seek a life sentence, I respectfully ask Your Honor for this additional time so that a mitigation report detailing Amaya-Ramirez's childhood is presented before sentencing.

**Page 2**

**Letter to Hon. DeArcy Hall**

**March 31, 2025**

The Court's consideration of this request is much appreciated. If there are any questions about this matter, I can be reached immediately on 917-751-5754.

Thank you.

Respectfully submitted,  
*Richard Palma*  
Richard Palma